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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: : DECLARATION OF
: SAMUEL DOLINGER
LETTER ROGATORY FOR :
INTERNATIONAL JUDICIAL : 24 Misc. 435
ASSISTANCE FROM THE TWENTY :
FOURTH CIVIL COURT OF ISTANBUL, : M 93
ISTANBUL, TÜRKİYE, :
IN THE MATTER OF EMINE EKE :
v. ESTATE OF SAFAK EKE :
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I, Samuel Dolinger, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an Assistant United States Attorney in the Office of the United States Attorney for the Southern District of New York, counsel for the United States of America (the “Government”). I make this declaration upon information and belief based upon the attached exhibits and communications with personnel in the United States Department of Justice, to which a letter of request for international judicial assistance has been transmitted for execution. I make this declaration in support of the Government’s request, pursuant to 28 U.S.C. § 1782(a),¹ for an order appointing me as a Commissioner for the purpose of obtaining information from Goldman Sachs and Wise US Inc., both located in New York, New York.

¹ Section 1782(a) provides, in pertinent part, as follows:

The district court of the district in which a person resides or is found may order him

2. In connection with a proceeding captioned “Emine Eke v. Estate of Safak Eke,” foreign reference number 2022/222, pending in the 24th Civil Court of Istanbul, in Istanbul, Türkiye (the “Turkish Court”), the Turkish Court issued a letter of request seeking information from Goldman Sachs and Wise US Inc. A true and correct copy of the letter rogatory (with redactions of sensitive or personally identifying information) is attached hereto as Exhibit A. (The information redacted in Exhibit A will not be redacted from the version of the letters rogatory that will be served on Goldman Sachs and Wise US Inc.)

3. Undated drafts of subpoenas addressed to (i) Goldman Sachs, Legal Department, 200 West Street, Floor 15, New York, NY 10007; and (ii) Wise US Inc., Legal Department, 30 West 26th Street, New York, NY 10010, which the Government intends to serve upon my appointment as Commissioner, are attached hereto, respectively, as Exhibits B and C.

4. To assist the Turkish Court in obtaining the requested information, I respectfully request that this Court appoint me as Commissioner as stated in the proposed *ex parte* order filed herewith.

to give his testimony or statement or to produce a document or other thing for use in a proceeding in a foreign or international tribunal, including criminal investigations conducted before formal accusation. The order may be made pursuant to a letter rogatory issued, or request made, by a foreign or international tribunal or upon the application of any interested person and may direct that the testimony or statement be given, or the document or other thing be produced, before a person appointed by the court. By virtue of his appointment, the person appointed has power to administer any necessary oath and take the testimony or statement. The order may prescribe the practice and procedure, which may be in whole or part the practice and procedure of the foreign country or the international tribunal, for taking the testimony or statement or producing the document or other thing. To the extent that the order does not prescribe otherwise, the testimony or statement shall be taken, and the document or other thing produced, in accordance with the Federal Rules of Civil Procedure.

5. No previous application for the relief sought herein has been made.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 20, 2024

/s/ Samuel Dolinger
SAMUEL DOLINGER
Assistant United States Attorney